

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In Re:

Bky. No.: 03-33611
Chapter 11 Case

Virgil Moeller,

Debtor.

**NOTICE OF CONTINUED HEARING ON KURT ANDERSON AND LLOYD
JOHNSON MOTIONS FOR ADMINISTRATIVE OR GENERAL UNSECURED
CLAIM;
AND CORRECTIONS TO KURT ANDERSON MOTION**

The motions of Kurt M. Anderson and Lloyd Johnson for allowance of administrative or general unsecured claims have been rescheduled. The Court will hold a hearing on the previously served and filed motions (with corrections noted below) on December 1, 2004, at 1:30 p.m. or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court, Hon. Gregory F. Kishel, Bankruptcy Courtroom No. 228B, United States Bankruptcy Court, 316 North Robert Street, St. Paul, Minnesota 55101.

Any response to this motion must be filed and delivered not later than November 24, 2004, which is seven days (including weekends and holidays) before the time set for the hearing, or filed and served by mail not later than November 21, 2004, which is ten days (including weekends and holidays) before the time set for the hearing. UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.

This continuance is made at the request of the operating trustee, who is serving and filing this notice of continued hearing and corrections.

On further review of the Kurt Anderson motion, the movant notes the following updates and corrections:

1. Adding actual fees and expenses of preparing, mailing, and prosecuting this motion and the Lloyd Johnson motion, through September 20, 2004, results in the following totals as compared with original totals; the undersigned will provide updated detail to parties who request it:

Item	Original Anderson motion amounts	Updated amounts
Date of last actual recorded item	8/17/04	9/20/04
Fees	\$24,227.25	\$25,472.25
Expenses	1,018.77	1,333.47
Subtotal	25,246.02	\$26,805.72
Less correction noted below – faxes	0.00	-40.89
Plus correction noted below – Qwest	0.00	14.09
Plus add'l estimated amount	\$2,204.44	1,000.00
Total	\$27,450.46	\$27,778.92

2. The September 20 affidavits of service by mail indicate mailing from a Minneapolis post office. Actual mailing occurred at the MSP airport post office, which falls within the St. Paul (551) zip code prefix. The affidavit of service to the matrix indicated service of a fee application under 11 USC § 330; the actual contents were those filed, a notice of two motions for administrative and/or general unsecured claims.

3. Some outgoing faxes were incorrectly billed at rates higher than the \$.20 rate indicated in the application. This results in a decrease of \$40.89.

3. The two exhibits to the original motion have minor inconsistencies. Although the “Bky Info Statement” billing recap contains some entries after August 20, 2004, these are not included in the subject matter subtotals labeled “Virgil Moeller / Fee and Expense Recap,” which reflects the actual amount claimed. The only entry that should have been added to the recap total is the Qwest long distance billing through August 23, 2004, of \$14.09.

VERIFICATION

I hereby declare under penalty of perjury that I have read the foregoing corrections; and that the facts stated therein are true and correct.

Executed on: October 7, 2004

/s/ Kurt M. Anderson
Kurt M. Anderson

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In Re:

Virgil Moeller, asf Vamco Trucking, Inc.
and Moeller Farms

Court File No. BKY 03-33611

Chapter 11 Case

Debtor.

UNSWORN CERTIFICATE OF SERVICE

I, Donna M. Voth declare under penalty of perjury that on October 8, 2004, I mailed copies of the Notice of Continued Hearing on Kurt Anderson and Lloyd Johnson Motions for Administrative or General Unsecured Claim; and Corrections to Kurt Anderson Motion to each entity below at the address stated below for each entity:

VIRGIL MOELLER PO BOX 109 SPRING VALLEY MN 55975
KURT M ANDERSON PO BOX 2434 MINNEAPOLIS MN 55402-0434
US TRUSTEE 1015 US COURTHOUSE 300 SOUTH FOURTH STREET MINNEAPOLIS MN 55415
US ATTORNEY 600 US COURTHOUSE 300 SOUTH FOURTH STREET MINNEAPOLIS MN 55415
MN DEPT OF REVENUE COLLECTION ENFORCEMENT 551 BANKRUPTCY SECTION PO BOX 64447 ST PAUL MN 55164
INTERNAL REVENUE SERVICE SPECIAL PROCEDURES BRANCH 316 N ROBERT ST STOP 5700 ST PAUL MN 55101
IRS DISTRICT COUNSEL 650 GALTIER PLAZA 175 E 5TH ST ST PAUL MN 55101
SECURITIES & EXCHANGE COMM BANKRUPTCY SECTION 500 W MADISON #1400 CHICAGO IL 60661-2511

AGCO FINANCE LLC PO BOX 3794 URBANDALE IA 50322-9714
AGSTAR FINANCIAL SERVICES 1921 PREMIER DR PO BOX 4249 MANKATO MN 56002-4249
CATERPILLAR FINANCIAL SERVICES PO BOX 340001 2120 WEST END AVE NASHVILLE TN 37203
PACCAR PO BOX 642945 PITTSBURGH PA 15264
AGSTAR FINANCIAL SERVICES C/O DUNLAP AND SEEGER -- ATTN: PAUL BUCHER PO BOX 549 ROCHESTER MN 55903-0549
MR. DENNIS RUTGERS EVAVOLD & RUTGERS LAW OFFICE, LLC PO BOX 39 RUSHFORD, MN 55971 ATTORNEY FOR KATHERINE MARIE MOELLER
U S DEPT OF AGRICULTURE - FARM SERVICE AGENCY C/O ROYLENE A CHAMPEAUX 600 U S COURTHOUSE 300 S 4TH ST MINNEAPOLIS MN 55415
COMMODITY CREDIT CORP USDA-FSA 413 FARMERS STREET NW PRESTON, MN 55965
FIRST NATIONAL EQUIPMENT FINANCING PO BOX 2137 OMAHA NE 68103-2137
SECURITY STATE BANK 310 MAIN ST OSTRANDER MN 55961-0037
WELLS FARGO ATTN: DANNY STROH 21 FIRST ST SW ROCHESTER MN 55902
CITI CAPITAL PO BOX 672032 DALLAS TX 75267-2032
CATERPILLAR FINANCIAL SERVICES CORP. C/O ALPHA KHALDI DORSEY & WHITNEY 50 S. 6 TH STREET STE 1500 MINNEAPOLIS MN 55402-1498

HOME FEDERAL 715 N. BROADWAY SPRING VALLEY, MN 55975
HAMMELL EQUIPMENT INC. BOX 448 CHATFIELD MN 55923
DIVINE SCHERZER & BRODY LTD ATTN: CHRIS ABEL 22 S 9 TH STREET STE 3000 MINNEAPOLIS, MN 55402-3340
CHARLES W. RIES 200 UNION SQUARE BUSINESS CENTER 201 NORTH BROAD STREET P.O. BOX 7 MANKATO, MN 56002-0007
HENRY WANG GRAY PLANT MOOTY 500 IDS CENTER 80 SOUTH EIGHTH STREET MINNEAPOLIS, MN 55402-3796 ATTORNEYS FOR FIRST NATIONAL EQUIPMENT FINANCIAL CORPORATION
PRINS TRUCKING INC. 414 OXFORD STREET WORTHINGTON MN 56187
SUNDRUP TRANSFER, INC. PO BOX 105 ARCADIA IA 51435
MIDWEST LABS 13611 "B" STREET OMAHA NE 68144
KWIK TRIP PO BOX 1597 LACROSSE WI 54601

Dated: October 8, 2004

/e/ Donne M. Voth
Donna M. Voth